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July 9, 2018

**VIA ECF**

Hon. Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: United States v. Lamont Evans, et al., 17 CR 684 (ER)**

Dear Judge Ramos:

I am writing on behalf of defendant Tony Bland to respectfully request a modification of the defendant's conditions of release which would permit him to travel to Las Vegas, Nevada for the NBA Summer League from Friday July 13 through Sunday July 15, in order to meet with other coaches and teams in the hopes of securing employment during the pendency of this case. Pretrial Services and the government, by AUSA Noah Solowiejczyk, have no objection to this request.

By way of background, on October 10, 2017, Judge Parker released Mr. Bland on a \$100,000 personal recognizance bond signed by two financially responsible persons with the special conditions that: 1) his travel be restricted to the Southern and Eastern Districts of New York, and the Southern and Central Districts of California; 2) that he surrender all travel documents; and 3) that he refrain from any contact with his codefendants outside of the presence of his attorneys. Since this case began, there has not been a single suggestion that Mr. Bland has violated the conditions of his release.

Finally, I am aware that one of Mr. Bland's co-defendants, Emanuel Richardson, has also requested permission to attend the NBA Summer League, and as such, Mr. Bland has been reminded that he is to have no contact with Mr. Richardson at any time outside the presence of his attorneys. And of course, should Your Honor approve this trip, Mr. Bland will provide Pretrial Services a detailed itinerary of his whereabouts.

JEFFREY LICHTMAN

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Thank you for your consideration of this application. I remain available for a conference should Your Honor deem it necessary.

Respectfully submitted,



Jeffrey Lichtman

cc: Noah Solowiejczyk, Esq.  
Eli Mark, Esq.  
Edward Diskant, Esq.  
Aline Flord, Esq.  
Robert Boone, Esq.  
Assistant United States Attorneys (by ECF)

Francesca Tessier-Miller  
United States Pretrial Services (by email)

So Ordered:

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Hon. Edgardo Ramos, U.S.D.J.